

~~DOCKET FILE COPY ORIGINAL~~

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
)  
Amendment of Section 76.51 ) CS Docket No. 94-  
of the Commission's Rules to )  
Include Bradenton, Florida )  
in the Market Presently )  
Designated the "Tampa- )  
St. Petersburg-Clearwater, )  
Florida" Television Market )  
  
To: Chief, Cable Services Bureau  
Stop Code 1200

**PETITION FOR RULEMAKING**

Bradenton Broadcast TV Company, Ltd., permittee of WFCT(TV),  
Channel 66, Bradenton, Florida, by its attorneys and pursuant to  
Section 1.401 of the Commission's Rules, petitions for rulemaking to amend  
47 C.F.R. § 76.51 to change the designation of the "Tampa-St. Petersburg-  
Clearwater, Florida" television market to "Tampa-St. Petersburg-Clearwater-  
Bradenton, Florida."

I. **INTRODUCTION AND BACKGROUND**

WFCT(TV) is an independent UHF station that commenced operation  
in August, 1994. Its community of license, Bradenton, is located in what is  
commonly called the Tampa Bay area. Bradenton is approximately 25 miles south of  
Tampa, 32 miles south of Clearwater, and 15 miles south of St. Petersburg. These  
four communities, because of their close proximity, have common social, cultural,

No. of Copies rec'd  
List A B C D E

244

trade and economic interests. Indeed, Bradenton is considered part of the overall Tampa Bay area by the local community, is included by Arbitron in the Tampa-St. Petersburg Area of Dominant Influence (ADI), and is included by Nielsen in the Tampa-St. Petersburg Designated Market Area (DMA).

The commonality of these communities is also shown by the overlapping signal coverage provided by area stations. As is shown in Appendix A, the Tampa and St. Petersburg stations WTVT(TV), WTTA(TV), WTOG(TV), WFTS(TV), WFLA-TV, and WBHS-TV all place a Grade A signal over Bradenton. Additionally, the St. Petersburg-Tampa station WTSP(TV) and the Clearwater station WCLF(TV) both place a Grade B signal over Bradenton. WFCT(TV), being a small independent television station, places a city grade signal over St. Petersburg, a Grade A signal over Tampa, and a Grade B signal over Clearwater. See Appendix B. Appendix C includes a map depicting a composite of the Grade B contours of WFCT(TV) and the other commercial television stations serving the Tampa Bay area. The map demonstrates that the overlapping signal coverage provided by these stations is extensive and that indeed these stations make up one television market. Because Bradenton is served by stations from Tampa, St. Petersburg, and Clearwater, and WFCT(TV) in turn serves the Tampa, St. Petersburg and Clearwater areas, WFCT(TV)'s market location necessarily places it in a competitive situation with the other television stations in the Tampa-St. Petersburg-Clearwater-Bradenton area.

Although WFCT(TV) is entitled to carriage on Tampa, St. Petersburg and Clearwater-area cable systems under the rules adopted in the Commission's Must-

Carry Order,<sup>1/</sup> such carriage would engender copyright license liability for the cable operators. This is because Section 111 of the Copyright Act, 17 U.S.C. § 111(f), continues to define "local" and "distant" stations according to previous Commission rules. Consequently, redesignation of the market as "Tampa-St. Petersburg-Clearwater-Bradenton" under Section 76.51 will permit WFCT(TV) to be carried on area cable systems on an equal basis with other television stations in the market without incurring "distant signal" copyright liability.

Section 4 of the 1992 Cable Act requires the Commission to make revisions needed to update the list of top 100 television markets and their designated communities as listed in Section 76.51.<sup>2/</sup> Revisions are periodically necessary, especially in cases such as this one where a new station has entered a market, in order to preserve the underlying competitive purpose of the market hyphenation rule: "[T]o delineate areas where stations can and do, both actually and logically, compete."<sup>3/</sup> The Commission has stated that where sufficient evidence demonstrates commonality between the proposed community to be added to a market designation and the market

---

<sup>1/</sup> Implementation of the Cable Television Consumer Protection and Competition Act of 1992, 8 FCC Rcd 2965 (1993) ("Must-Carry Order").

<sup>2/</sup> See 47 U.S.C. § 614.

<sup>3/</sup> TV 14, Inc., 7 FCC Rcd 8591, 8592 (1992) (Rome, Georgia).

as a whole, it will consider such cases under an expedited rulemaking procedure.<sup>4/</sup>

## II. ARGUMENT

In evaluating past requests for hyphenation of a market, the Commission has considered four factors: 1) the distance between the existing designated communities and the community proposed to be added to the designation; 2) whether cable carriage, if afforded to the subject station, would extend to areas beyond its Grade B signal coverage area; 3) the presence of a clear showing of a particularized need by the station requesting the change of market designation; and 4) an indication of benefit to the public from the proposed change.<sup>5/</sup> Here, WFCT(TV) meets the Commission's four criteria.

First, as previously noted, Bradenton is located only 25 miles south of Tampa, 32 miles south of Clearwater, and 15 miles south of St. Petersburg. Note that Bradenton is much closer to these three communities than Rome, Georgia, is to Atlanta, Georgia, and the Commission added Rome to the Atlanta market in its Must Carry Order.<sup>6/</sup> Two different market ratings firms also group Bradenton with Tampa, St. Petersburg and Clearwater. Arbitron includes Bradenton in the Tampa-St. Petersburg ADI and Nielsen includes Bradenton in its Tampa-St. Petersburg DMA.

---

4/ See Amendment of Section 76.51 of the Commission's Rules to Include Kenosha and Racine, Wisconsin, in the Milwaukee, Wisconsin Television Market, Notice of Proposed Rulemaking, 9 FCC Rcd 2249 (1994).

5/ See, e.g., Major Television Markets (Fresno - Visalia, California), 57 RR 2d 1122 (1985).

6/ Rome is approximately 60 miles north of Atlanta.

Moreover, Bradenton is considered by the local community to be part of the Tampa Bay area. Rather than dividing the various communities, Tampa Bay actually unifies much of the industry in the region. Thus, Bradenton competes with Tampa, St. Petersburg and Clearwater companies in shipping, fishing, tourism and agriculture. Bradenton is a member of the Tampa Bay Regional Planning Council and the Tampa Bay Partnership, a regional economic development group. Bradenton also is included along with Tampa, St. Petersburg and Clearwater in the Southwest Florida Water Management District and Florida's Health and Rehabilitation Services District Six. Media throughout the Tampa Bay area cover events in all four cities. Indeed, WFCT's own public affairs programs, "Our Tampa Bay" and "The Manatee View" are devoted to discussion of issues and concerns respectively to the overall Tampa Bay area and to those communities, including Bradenton, which make up Manatee County. In sum, Bradenton is part and parcel of the Tampa Bay area.

The second factor, whether cable carriage, if afforded to the subject station, would extend to areas beyond its Grade B signal coverage area, no longer appears to be relevant because the new rules adopted by the Commission in the Must Carry Order are keyed to the ADI rather than the Grade B contour looked to under previous rules. Nevertheless, WFCT(TV)'s proposed modification of Section 76.51 substantially complies with this criterion since the majority of the Tampa, St. Petersburg and Clearwater cable systems that would be affected by the rule change are within the Grade B contour of WFCT(TV).

Third, as a new station to the Tampa Bay area, WFCT(TV) must be able to compete with other area stations. Although WFCT(TV) has only been on the air for a short time, it is being promoted as a full market station serving the entire Tampa Bay area. In order to compete with other stations in the market, WFCT(TV) intends to charge rates comparable to those charged by other commercial independent stations in the market. Without inclusion in the area television market, however, WFCT(TV) will be placed at a substantial financial disadvantage among its market competitors while it is denied access to its natural audience.

Fourth, and most important, adding WFCT(TV) to the Tampa-St. Petersburg-Clearwater market will significantly benefit the public. WFCT(TV) is an independent station that broadcasts a combination of commercial and religious programming whose daily schedule is largely unduplicated by any other television station in the Tampa Bay area. WFCT(TV) also is airing two public affairs programs each week covering issues of concern to Bradenton and other communities in Manatee County and to the Tampa Bay area as a whole. Many area viewers, however, will not be able to watch WFCT(TV) on cable if Bradenton is not part of the Tampa-St. Petersburg-Clearwater market. Of the 2,890,359 people in the Tampa-St. Petersburg-Clearwater ADI, 1,710,395 people or 59.2% reside outside of the 35-mile zone surrounding Bradenton.<sup>7/</sup> Unless Bradenton is included in the Tampa-St. Petersburg-

---

<sup>7/</sup> See Engineering Statement of William C. King, Jr., P.E., attached as Appendix D.

Clearwater ADI, WFCT(TV), which only recently went on the air, will incur substantial copyright liability in reaching these viewers by cable.

### III. CONCLUSION

WFCT(TV)'s proposed redesignation of the Tampa Bay area market is consistent with the rationale of the Commission's Must Carry Order. As is shown above, WFCT(TV) shares a common market with stations in the Tampa, St. Petersburg, and Clearwater area, and must compete with these area stations for programming, advertisers, and viewers. Without official designation as a local station, however, WFCT(TV) will not be able to compete with area stations because its potential viewership will be significantly reduced. Accordingly, WFCT(TV) respectfully requests that the Commission issue a notice of proposed rulemaking to

amend Section 76.51 of the Rules to redesignate the Tampa Bay area market as the  
"Tampa-St. Petersburg-Clearwater-Bradenton, Florida" television market.

Respectfully submitted,

BRADENTON BROADCAST TV COMPANY,  
LTD

By:   
Robert L. Ulrich

Its Attorney

BAYNARD, HARRELL, OSTOW & ULRICH, P.A.  
Twelfth Floor  
100 Second Avenue South  
St. Petersburg, Florida 33701

(813) 823-5000

September 14, 1994



## **APPENDIX A**

# Florida—Tampa-St. Petersburg

**WTVT**

Ch. 13

**Network Service:** CBS.

**Licensee:** TVT License Inc., 3213 John F. Kennedy Blvd., Tampa, FL 33609.

**Studio:** 3213 John F. Kennedy Blvd., Tampa, FL 33609.

**Mailing Address:** Box 31113, Tampa, FL 33631-3113.

**Telephone:** 813-876-1313. **TWX:** 810-876-0618. **Fax:** 813-875-8329.

**Technical Facilities:** Channel No. 13 (210-216 MHz). Authorized power: 316-kw visual, 47.5-kw aural. Antenna: 1416-ft. above av. terrain, 1463-ft. above ground, 1549-ft. above sea level.

Latitude 27° 49' 09"  
Longitude 82° 14' 26"

**Transmitter:** 4.4-mi. NNE of Balm, FL.

**Multichannel TV Sound:** Stereo and separate audio program.

**Satellite Earth Stations:** Andrew, 5.6-meter Ku-band; RCA, 6.1-meter Ku-band; Scientific-Atlanta, 7-meter C-band; M/A-Com, Microdyne, Scientific-Atlanta receivers.

**SNG Mobile Dish:** Andrew, 3-meter Ku-band.

**News Services:** AP, CBS, CNN, Conus, Sports News Satellite, UPI.

**Ownership:** SCI Television Inc. (Group Owner).

**Began Operation:** April 1, 1955. Sale to Gaylord Bcstg. by ex-Gov. Doyle E. Carlton and W. Walter Tison interests approved by FCC July 18, 1956 (*Television Digest*, Vol. 12:26, 29). Sale to WTVT Inc. by Gaylord Bcstg. Co. approved by FCC April 23, 1987 (Vol. 27:11, 29). Transfer to Trustee approved Sept. 1, 1992. Sale to present owner approved April 23, 1993 (Vol. 33:10).

**Represented (sales):** TeleRep Inc.

**Represented (legal):** Pepper & Corazzini.

**Represented (engineering):** A. D. Ring & Associates, P.C.

## Personnel:

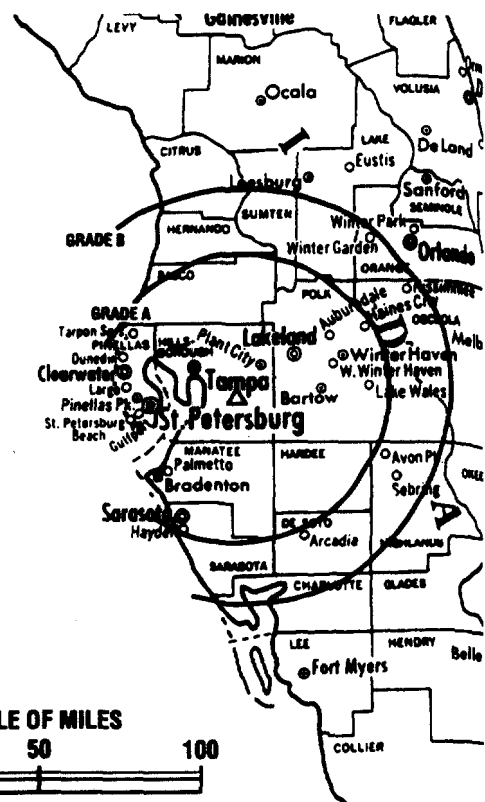
C. David Whitaker, President & General Manager.  
Terry Cooper, Vice President & Controller.  
Bob Franklin, Vice President, News & Operations.  
Mark Higgins, Vice President & Director, Sales.  
Bob Linger, National Sales Manager.  
Daniel Webster, News Director.  
J. Lowell Otto, Chief Engineer.  
Candace Geiger, Business Development Manager.  
Liz Brunner, Director of Community Relations.  
Mark Demopoulos, Director, Marketing.

**Highest 30 Sec. Rate:** \$6000.

**NETWORK BASE HOURLY RATE:** \$2175.

**City of License:** Tampa. **ADI:** Tampa-St. Petersburg. **Rank:** 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WTVT BMPCT-6216 Granted 5/9/66

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA			
	Citrus	44,300	43,600	98
	Hardee	6,400	6,300	98
	Hernando	47,000	46,400	99
	Highlands	31,700	31,300	99
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
	Pinellas	392,600	390,000	99
Between 25-49%	Polk	162,900	161,500	99
	Sarasota	131,500	130,500	99
	FLORIDA			
Between 25-49%	De Soto	8,600	8,500	99
	Sumter	12,700	12,500	98
Between 5-24%	FLORIDA			
	Charlotte	52,900	52,300	99
	Levy	10,500	10,200	97
	Marion	84,500	83,200	98
<b>Station Totals</b>		<b>1,553,600</b>	<b>1,539,700</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>1,218,700</b>
<b>Average Daily Circulation (1993)</b>				<b>709,700</b>

# Florida—St. Petersburg

**WTTA**

Ch. 38

Network Service: None, independent.

Licensee: Bay Television Inc.

Studio: 5510 Gray St., Tampa, FL 33609-1054.

Telephone: 813-289-3838. Fax: 813-289-0000.

Technical Facilities: Channel No. 38 (614-620 MHz). Authorized power: 1397-kw max. visual. Antenna: Circularly polarized, 1436-ft. above av. terrain, 1427-ft. above ground, 1502-ft. above sea level.

Latitude 27° 50' 32"  
Longitude 82° 15' 46"

Transmitter: 15001 Boyette Rd., Riverview, FL 33569.

Satellite Earth Station: Comtech, 7.3-meter; Agile receivers.

Ownership: Sinclair Broadcast Group Inc. (Group Owner); Robert Simmons.

Began Operation: June 21, 1991.

Represented (legal): Fisher, Wayland, Cooper & Leader.

Represented (engineering): Carl T. Jones Corp.

## Personnel:

Tom Watson, General Manager.

Bruce Stamo, General Sales Manager.

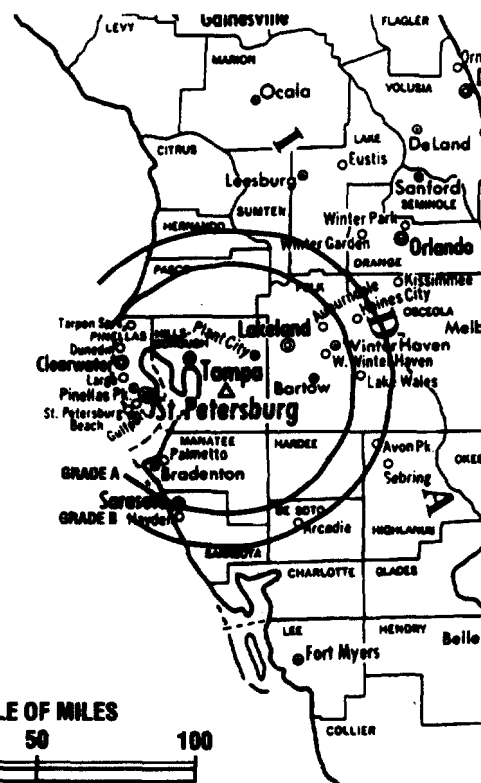
Jennifer Isenhower, Program Director.

Steve Hess, Chief Engineer.

City of License: St. Petersburg. ADI: Tampa-St. Petersburg. Rank: 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	FLORIDA			
	Hardee	6,400	6,300	98
Between 5-24%	FLORIDA			
	De Soto	8,600	8,500	99
	Hernando	47,000	46,400	99
	Highlands	31,700	31,300	99
	Hillsborough	342,800	340,100	99



WTTA BMPCT-880512KE Granted 6/30/88 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 5-24%	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
	Pinellas	392,600	390,000	99
	Polk	162,900	161,500	99
	Sumter	12,700	12,500	98
Station Totals		1,229,900	1,219,900	99
Net Weekly Circulation (1993)				107,500
Average Daily Circulation (1993)				27,700

# Florida—St. Petersburg-Tampa

**WTOG**

Ch. 44

**Network Service:** None, independent.

**Licensee:** WTOG-TV Inc., 3415 University Ave., St. Paul, MN 55114.

**Studio:** 365 105th Terrace NE, St. Petersburg, FL 33716.

**Mailing Address:** Box 20144, St. Petersburg, FL 33742.

**Telephone:** 813-576-4444. **Fax:** 813-577-1806.

**Technical Facilities:** Channel No. 44 (650-656 MHz). Authorized power: 5000-kw max. visual, 500-kw max. aural. Antenna: 1490-ft. above av. terrain, 1480-ft. above ground, 1555-ft. above sea level.

Latitude 27° 49' 48"  
Longitude 82° 15' 59"

**Transmitter:** 13310 Rhodine Rd., approx. 4-mi. SE of Riverview.

**Satellite Earth Stations:** Microdyne, 7-meter C-band; Harris, 6.1-meter C-band; Scientific-Atlanta, Harris receivers.

**News Services:** AP, Conus, WTN.

**Ownership:** Hubbard Broadcasting Inc. (Group Owner).

**Began Operation:** November 4, 1968.

**Represented (sales):** Petry Television Inc.

**Represented (legal):** Fletcher, Heald & Hildreth.

**Represented (engineering):** Lohnes & Culver.

## Personnel:

Edward Allen, President & General Manager.  
C. M. (Mike) Gehring, General Sales Manager.  
Shawn Bartlett, Local Sales Manager.  
Larry McCabe, Local Sales Manager.  
Dorothy McKeenan, National Sales Manager.  
Jim Labranche, News Director.  
Robert Affe, Program Director.  
Jonathan Katz, Promotion Manager.  
Stewart Wallace, Business Manager.  
John Kays, Chief Engineer.

**Rates:** On request.

**City of License:** St. Petersburg. **ADI:** Tampa-St. Petersburg. **Rank:** 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA			
	Hardee	6,400	6,300	98
	Hernando	47,000	46,400	99
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99



WTOG BPCT-890504KE Granted 5/31/89 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Pinellas	392,600	390,000	99
	Polk	162,900	161,500	99
FLORIDA				
Between 25-49%	Citrus	44,300	43,600	98
	De Soto	8,600	8,500	99
	Highlands	31,700	31,300	99
	Marion	84,500	83,200	98
	Sarasota	131,500	130,500	99
	Sumter	12,700	12,500	98
FLORIDA				
Between 5-24%	Charlotte	52,900	52,300	99
	Lake	67,900	67,300	99
	Lee	151,500	150,100	99
	Levy	10,500	10,200	97
	Osceola	43,100	42,600	99
Station Totals		1,816,100	1,799,700	99
Net Weekly Circulation (1993)			802,100	
Average Daily Circulation (1993)			311,300	

# Florida—Tampa-St. Petersburg

## WFTS

Ch. 28

Network Service: Fox.

Licensee: Tampa Bay Television Inc., Box 30028, Tampa, FL 33630.

Studio: 4501 E. Columbus Dr., Tampa, FL 33605.

Telephone: 813-623-2828. Fax: 813-744-2828.

Technical Facilities: Channel No. 28 (554-560 MHz). Authorized power: 2630-kw max. visual, 263-kw max. aural. Antenna: 1546-ft. above av. terrain, 1538-ft. above ground, 1613-ft. above sea level.

Latitude 27° 50' 32"  
Longitude 82° 15' 46"

Transmitter: 15001 Boyette Rd., Riverside.

Satellite Earth Stations: Andrew, 7.3-meter Ku & C-band; Scientific-Atlanta, 7-meter C-band; Scientific-Atlanta, 4.5-meter C-band.

News Service: AP.

Ownership: Scripps Howard Broadcasting Co. (Group Owner).

Began Operation: December 14, 1981. Sale to present owner approved by FCC Nov. 14, 1985 (Television Digest, Vol. 25:30). Sale to Capital Cities Communications by Ian Wheeler, et al., approved by FCC July 23, 1984 (Vol. 24:17).

Represented (sales): Katz Television.

Represented (legal): Baker & Hostetler.

Represented (engineering): Jules Cohen & Associates, P.C.

### Personnel:

Jim Major, Vice President & General Manager.  
Larry Jopek, General Sales Manager.  
Michael Berich, Local Sales Manager.  
Marsha Kidd-Collins, National Sales Manager.  
Lee Melvin, Engineering Manager.  
Joseph Logsdon, Creative Services & Program Manager.  
Chris Rayner, Promotion Manager.  
J. Paul Wilson, Business Manager.  
Luis Romero, Production & Operations Manager.  
Wanda Snyder, Traffic Manager.  
Joy Pettit, Community Affairs Manager.

Rates: On request.

City of License: Tampa. ADI: Tampa-St. Petersburg. Rank: 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA De Soto	8,600	8,500	99



WFTS BPCT-870209KF Granted 3/31/87 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Hardee	6,400	6,300	98
	Highlands	31,700	31,300	99
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
	Pinellas	392,600	390,000	99
	Polk	162,900	161,500	99
Between 25-49%	FLORIDA			
	Citrus	44,300	43,600	98
	Hernando	47,000	46,400	99
	Sarasota	131,500	130,500	99
Between 5-24%	FLORIDA			
	Charlotte	52,900	52,300	99
Station Totals		1,458,600	1,446,300	99
Net Weekly Circulation (1993)			748,600	
Average Daily Circulation (1993)			293,700	

# Florida—Tampa-St. Petersburg

## WFLA-TV

Ch. 8

Network Service: NBC.

Licensee: Tampa Television Inc., 905 E. Jackson St., Tampa, FL 33602.

Studio: 905 E. Jackson St., Tampa, FL 33602.

Telephone: 813-228-8888. TWX: 810-876-0602. Fax: 813-221-5787.

Technical Facilities: Channel No. 8 (180-186 MHz). Authorized power: 316-kw visual, 31.6-kw aural. Antenna: 1536-ft. above av. terrain, 1545-ft. above ground, 1612-ft. above sea level.

Latitude 27° 50' 32"  
Longitude 82° 15' 46"

Transmitter: 15001 Boyette Rd., 5.5-mi. N of Balm.

Multichannel TV Sound: Stereo and separate audio program.

Satellite Earth Stations: Transmit/receive Harris, 6.1-meter Ku-band; Scientific-Atlanta, 7-meter C-band; Microband, 5-meter C-band; DX Engineering, Harris, M/A-Com, Scientific-Atlanta receivers.

News Service: NBC.

Ownership: Media General Inc. (Group Owner).

Began Operation: February 14, 1955.

Represented (sales): MMT Sales Inc.

Represented (legal): Cohn & Marks.

Represented (engineering): David Steel & Associates.

### Personnel:

Jim Zimmerman, President & General Manager.

Paul Cate, Vice President & Station Manager.

Jack Lyons, General Sales Manager.

Jay Burmer, Local Sales Manager.

Roy Tym, National Sales Manager.

Arnell Hill, Director of Engineering & Operations.

Dan Bradley, News Director.

Russ Myerson, Director of Programming.

Melinda Bacon, Director of Marketing & Promotion.

Joyce Luaders, Business Manager.

Ed Whitley, Production Manager.

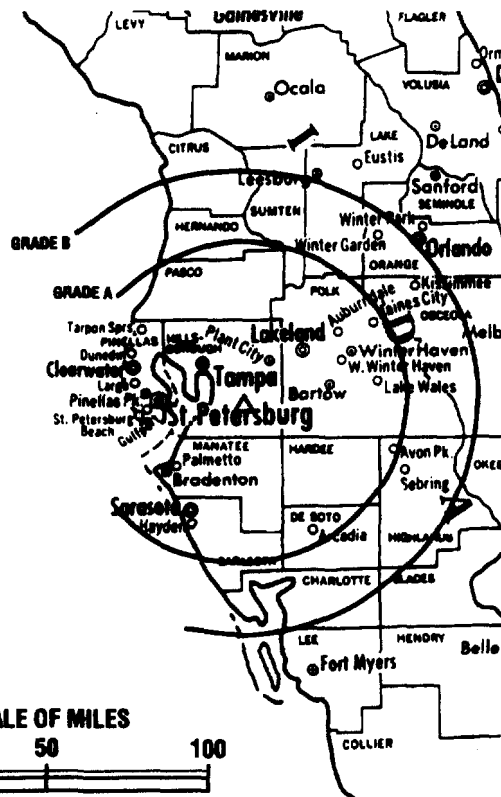
Rates: On request.

NETWORK BASE HOURLY RATE: \$1650.

City of License: Tampa. ADI: Tampa-St. Petersburg. Rank: 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA Charlotte	52,900	52,300	99



WFLA-TV BPCT-850426KG Granted 1/15/87 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Citrus	44,300	43,600	98
	Hardee	6,400	6,300	98
	Hernando	47,000	46,400	99
	Highlands	31,700	31,300	99
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
	Pinellas	392,600	390,000	99
	Polk	162,900	161,500	99
	Sarasota	131,500	130,500	99
Between 25-49%	FLORIDA			
	De Soto	8,600	8,500	99
	Sumter	12,700	12,500	98
Between 5-24%	FLORIDA			
	Glades	3,000	2,900	97
	Levy	10,500	10,200	97
Station Totals		1,472,100	1,459,400	99
Net Weekly Circulation (1993)			1,245,100	
Average Daily Circulation (1993)			713,900	

## Florida—Tampa

### WBHS-TV

Ch. 50

**Network Service:** Home Shopping Network.

**Licenses:** Silver King Broadcasting of Tampa Inc., Box 9090, Clearwater, FL 34618-9090.

**Studio:** 18491 U.S. Hwy. 19 S, Clearwater, FL 34624.

**Mailing Address:** Suite 301, 12425 28th St. N, St. Petersburg, FL 33716.

**Telephone:** 813-573-5550. **Fax:** 813-571-1931.

**Technical Facilities:** Channel No. 50 (686-692 MHz). Authorized power: 4170-kw max. visual. Antenna: 1522-ft. above av. terrain, 75-ft. above ground, 1447-ft. above sea level.

Latitude 27° 50' 32"  
Longitude 82° 15' 46"

**Transmitter:** 15001 Boyette Rd., Riverview.

**Multichannel TV Sound:** Stereo only.

**Ownership:** Silver King Communications Inc. (Group Owner).

**Began Operation:** March 1, 1988.

**Represented (sales):** Silver King Broadcasting Sales.

#### Personnel:

Jim Goodman, Vice President & Station Manager.

Allen McCarty, Chief Engineer.

Cheryl Barron, Program Manager.

**Highest 30 Sec. Rate:** \$130.

**City of License:** Tampa. **ADI:** Tampa-St. Petersburg. **Rank:** 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WBHS-TV BMPCT-870915KH Granted 10/30/87 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 5-24%	FLORIDA Hardee	6,400	6,300	98
Station Totals		6,400	6,300	98
Net Weekly Circulation (1993)				9,100
Average Daily Circulation (1993)				2,500

# Florida—St. Petersburg-Tampa

**WTSP**

Ch. 10

**Network Service:** ABC.

**Licensee:** Great American Television & Radio Co. Inc., Box 10000, St. Petersburg, FL 33733.

**Studio:** 11450 Gandy Blvd., St. Petersburg, FL 33702.

**Telephones:** 813-557-1010; 813-224-9877. Fax: 813-578-7637.

**Technical Facilities:** Channel No. 10 (192-198 MHz). Authorized power: 316-kw visual, 31.6-kw aural. Antenna: Circularly polarized, 1501-ft. above av. terrain, 1504-ft. above ground, 1512-ft. above sea level.

Latitude 28° 11' 04"  
Longitude 82° 45' 39"

**Transmitter:** 2.6-mi. N of Tarpon Springs.

**Satellite Earth Stations:** AFC, 5-meter Ku-band; Andrew, 7.3-meter C-band; Harris, 9-meter C-band; Microdyne, 5-meter Ku-band; Avantek, Harris, Microdyne receivers.

**SNG Mobile Dish:** Dalsat, 3.7-meter Ku-band.

**News Services:** AP, UPI.

**Ownership:** Great American Broadcasting Co. (Group Owner).

**Began Operation:** July 18, 1965 on interim basis; full time ABC, Sept. 1, 1965. Merger of Rahall Communications with Gulf United approved by FCC July 27, 1978 (Television Digest, Vol. 17:35). Sale to Taft Television & Radio approved by FCC May 30, 1985 (Vol. 25:5, 20, 22). FCC approved sale to present owners Oct. 2, 1987 (Vol. 27:16, 18, 23, 30, 41).

**Represented (sales):** Harrington, Righter & Parsons Inc.

**Represented (legal):** Koteen & Naftalin.

## Personnel:

Steve Mauldin, President & General Manager.  
Noreen Parker, Vice President, Sales.  
Barbara Sobocinski, Vice President, Marketing.  
Pam Barber, Local Sales Manager.  
Ken Lucas, Regional Sales Manager.  
Martin Reimick, National Sales Manager.  
Mike Cavender, News Director.  
Dan Reynolds, Business Manager.  
Kathy Baker, Production Manager.

**Rates:** On request.

**City of License:** St. Petersburg. ADI: Tampa-St. Petersburg. Rank: 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WTSP BPCT-901108KF Granted 1/17/91

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA			
	Citrus	44,300	43,600	98
	Hernando	47,000	46,400	99
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
Between 25-49%	FLORIDA			
	Sarasota	131,500	130,500	99
	Sumter	12,700	12,500	98
Between 5-24%	FLORIDA			
	Hardee	6,400	6,300	98
	Highlands	31,700	31,300	99
	Levy	10,500	10,200	97
<b>Station Totals</b>		<b>1,407,600</b>	<b>1,395,700</b>	<b>98</b>
<b>Net Weekly Circulation (1993)</b>				<b>1,076,700</b>
<b>Average Daily Circulation (1993)</b>				<b>639,100</b>

Flori

Network  
License  
Studio:  
Teleph  
Techni  
max.  
group

Transm  
Satellit  
Owner:  
Began  
Repres  
Repres  
Person  
Tom  
Bruc  
Jenn  
Steve

City of  
Total Hou  
County ci

Net W  
Circul

Between

Between



## Florida—Clearwater

**WCLF**

**Ch. 22**

**Network Service:** None, independent.

**Licensee:** Christian Television Corp. Inc., Box 6922, Clearwater, FL 34618.

**Studio:** 6922 142nd Ave. N, Largo, FL 34641.

**Mailing Address:** Box 6922, Clearwater, FL 34618.

**Telephone:** 813-535-5622. **Fax:** 813-531-2497.

**Technical Facilities:** Channel No. 22 (518-524 MHz). Authorized power: 5000-kw max. & 1170-kw horizontal visual, 500-kw max. & 117-kw horizontal aural. Antenna: 1429-ft. above av. terrain, 1538-ft. above ground, 1549-ft. above sea level.

Latitude 28° 11' 04"  
Longitude 82° 45' 39"

**Transmitter:** 2.6-mi. N of Tarpon Springs.

**Satellite Earth Stations:** Transmit/receive Comtech, 5-meter C-band; Vertex, 6.1-meter Ku-band; Winegard, 3-meter C-band; ADU, Echostar, M/A-Corn receivers.

**Ownership:** Christian Television Network (Group Owner).

**Began Operation:** October 24, 1979.

**Represented (legal):** Gammon & Grange.

### Personnel:

**Robert R. D'Andrea**, General Manager.

**Robert T. Kennedy**, Director of Cable Relations/Special Projects.

**Cardin A. Hesselton**, Sales Manager & Program Director.

**Carl Berger**, Chief Engineer.

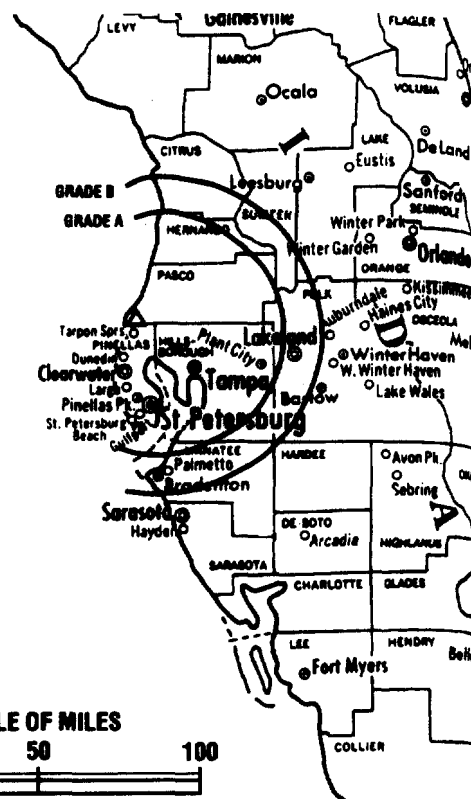
**Jack Jarvis**, Production Manager.

**Neville Chantersingh**, Director of Finance.

**Highest 30 Sec. Rate:** \$150.

**City of License:** Clearwater. **ADI:** Tampa-St. Petersburg. **Rank:** 16.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

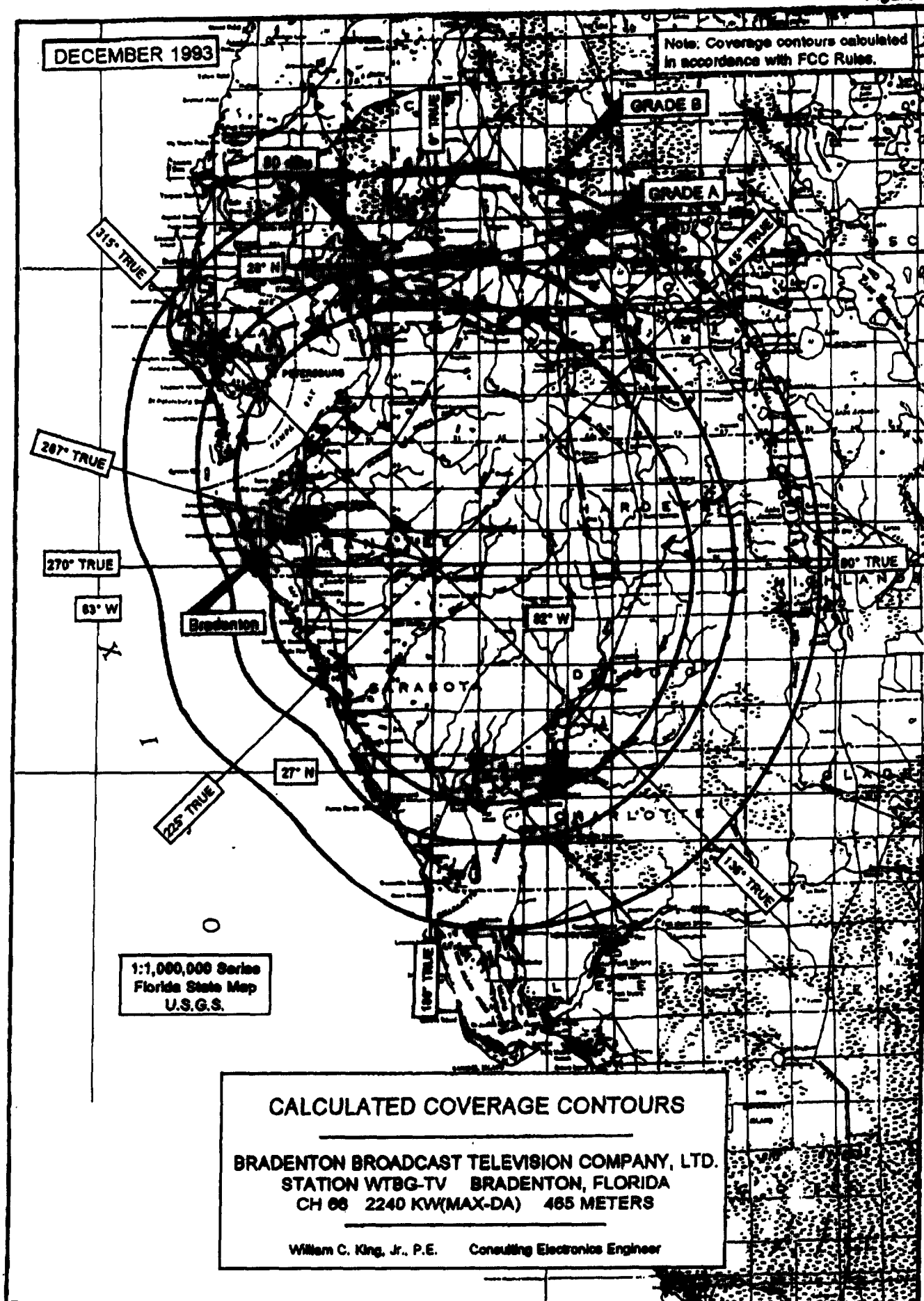


WCLF BMPCT-790425KG Granted 9/25/79 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 5-24%	FLORIDA			
	Hillsborough	342,800	340,100	99
	Manatee	95,900	95,200	99
	Pasco	129,300	128,100	99
<b>Station Totals</b>		<b>568,000</b>	<b>563,400</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>			<b>56,600</b>	
<b>Average Daily Circulation (1993)</b>			<b>18,200</b>	

## **APPENDIX B**

Figure 9



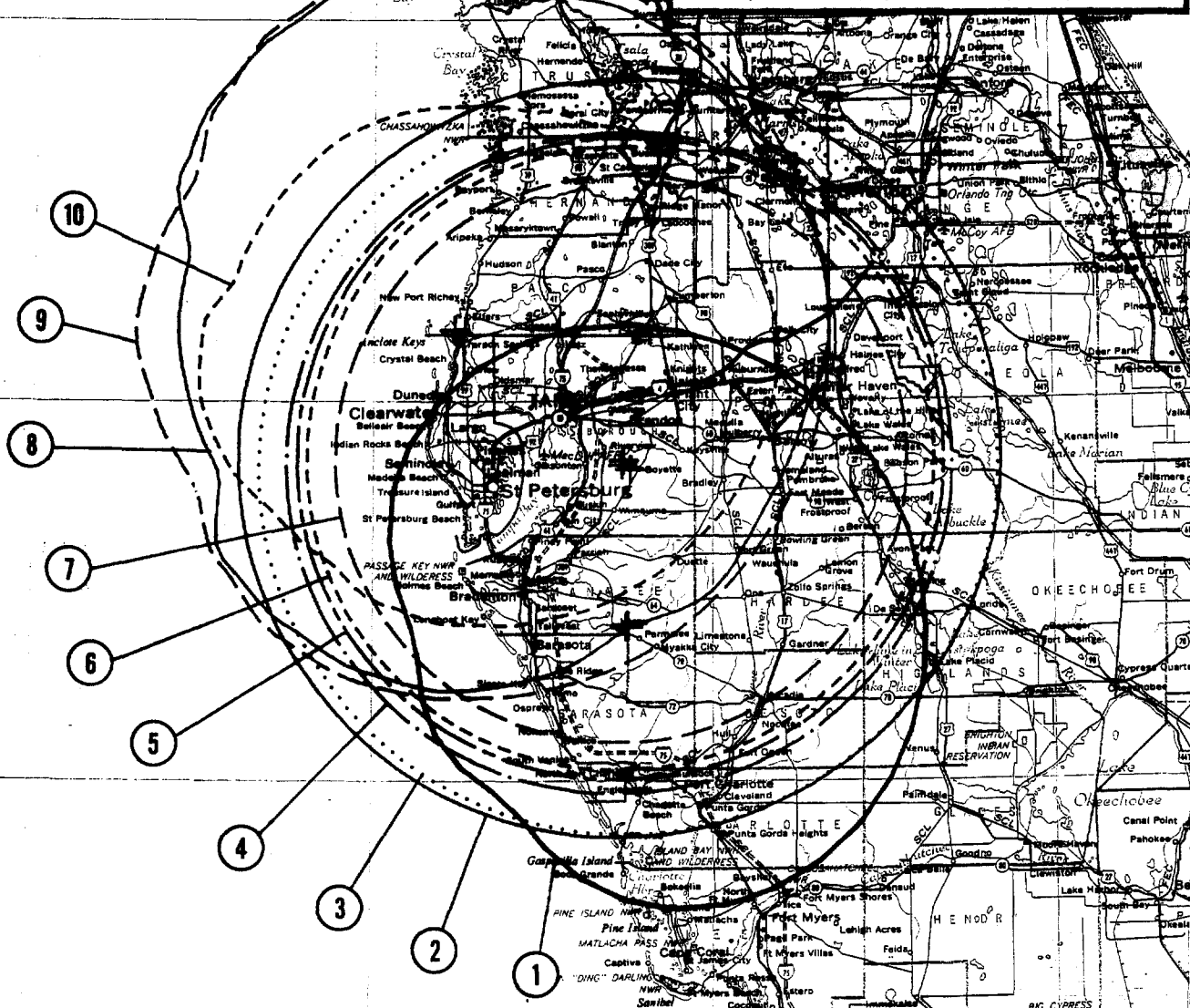
## **APPENDIX C**

SEPTEMBER 1994

Note: All contours are television Grade B, calculated in accordance with FCC Rules.

## KEY TO NUMBERED CONTOURS

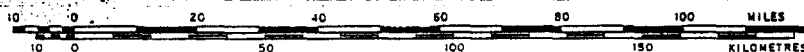
1. WFCT, BRADENTON, FL, CH 66, 2240 KW(MAX-DA), 465 M
2. WFLA-TV, TAMPA, FL, CH 8, 316 KW, 471 M
3. WTVT, TAMPA, FL, CH 13, 316 KW, 433 M
4. WTOG, ST. PETERSBURG, FL, CH 44, 5000 KW, 454 M
5. WBSH-TV, TAMPA, FL, CH 50, 4170 KW, 445 M
6. WFTS, TAMPA, FL, CH 28, 2630 KW, 471 M
7. WTTA, ST. PETERSBURG, FL, CH 38, 1410 KW, 436 M
8. WTSP (UC), ST. PETERSBURG, FL, CH 10, 316 KW(MAX-DA), 454 M
9. WTSP (CP), ST. PETERSBURG, FL, CH 10, 316 KW(MAX-DA), 456 M
10. WCLF, CLEARWATER, FL, CH 22, 5000 KW(MAX-DA), 433 M



## TAMPA-ST. PETERSBURG-CLEARWATER TELEVISION MARKET COMMERCIAL COVERAGE COMPARISON

BRADENTON BROADCAST TELEVISION COMPANY, LTD.  
STATION WFCT, BRADENTON, FLORIDA  
CH 66 2240 KW(MAX-DA) 465 METERS

William C. King, Jr., P.E. Consulting Electronics Engineer



## **APPENDIX D**

William C. King, Jr., P.E.  
Consulting Electronics Engineer  
Washington, D.C. 20035-5318

---

**APPENDIX D  
ENGINEERING STATEMENT  
PREPARED FOR  
BRADENTON BROADCAST TELEVISION COMPANY, LTD.  
STATION WFCT, BRADENTON, FLORIDA  
CH 66 2240 KW(MAX-DA) 465 METERS**

William C. King, Jr., says that he is a consulting electronics engineer; that he is a professional engineer registered in the District of Columbia; and that his qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission. The instant engineering statement has been prepared on behalf of Bradenton Broadcast Television Company, Ltd., licensee of television station WFCT, channel 66, Bradenton, Florida. Pursuant to authorization, the undersigned has determined the 1990 population residing within the *Tampa-St. Petersburg (Lakeland), Florida, Area of Dominant Influence ("ADI")*, but situated outside of a circle of 35-mile radius, centered on the Bradenton reference point, to be 1,710,395 persons, or 59.2 percent of the total 1990 ADI population. The determination methodology is described in the paragraphs which follow.

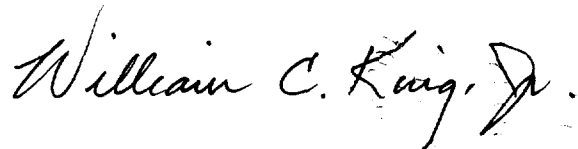
As reported in the *Arbitron ADI Market Atlas*, on page C-192 of the *Broadcasting & Cable Yearbook 1994*, the Tampa-St. Petersburg ADI consists of the following ten Florida counties: Citrus, De Soto, Hardee, Hernando, Highlands, Hillsborough, Manatee, Pasco, Pinellas and Polk. Based upon 1990 U.S. Census data, the total population of the ten ADI counties is 2,890,359. Bradenton is not one of the communities whose reference point geographic coordinates are listed in Section 76.53 of the FCC Rules. The main post office for the community is situated at 824 Manatee Avenue West, in Bradenton, for which the undersigned has determined geographic coordinates to be: 27° 29' 44" North Latitude, 82° 34' 15" West Longitude.

Appendix D  
Engineering Statement

Page 2

The 1990 population contained within a circle of 35-mile (56.3-kilometer) radius, centered on the Bradenton main post office, was determined by means of a computer program which sums the population of all census enumeration districts whose centroids lie within the circle. The circle of 35-mile radius centered on the Bradenton main post office encloses portions of five Florida counties, four of which are included within the Tampa-St. Petersburg ADI. The sum of the population of those portions of the four ADI counties within the 35-mile radius totals 1,179,964 persons. The ADI population outside the 35-mile circle was obtained by simple subtraction from the total population for all ADI counties.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on September 14, 1994.

A handwritten signature in cursive script that reads "William C. King, Jr." followed by a period.

William C. King, Jr., P.E.